

# Modern Slavery Act 2015 Statement

## Pepper Money

### Introduction

This statement is made on behalf of UK Mortgage Lending Ltd, Pepper Money Limited (Pepper Money) and Pepper Money Group Limited pursuant to section 54(1) of the Modern Slavery Act 2015.

At Pepper Money and Pepper Money Group Limited we recognise the responsibility that we have as a commercial organisation to prevent and combat modern slavery in our business and the supply chains we participate in. We aim to achieve this by operating in a manner that is ethical, transparent and fair and we have designed policies and procedures to drive this behaviour in every area of our business.

### Organisation's structure and supply chains

We are incorporated in England and Wales, with UK Mortgage Lending Ltd registered company number 08698121, Pepper Money Limited registered company number 112792453 and Pepper Money Group Limited registered company number 11279067 and our registered office is at 4 Capital Quarter, Tyndall Street, Cardiff, Wales, CF10 4BZ.

Pepper Money are a FCA-regulated mortgage lender operating in the UK financial services market. We are a part of the global Pepper Group (Group) with our head office being in Sydney, Australia. The Group operates various loan administration, financial advisory, residential mortgage and consumer lending businesses in Europe, Asia and the Pacific regions and has over 1,000 employees worldwide.

### Our business

Pepper Money Group Limited is the holding company of Pepper Money.

Pepper Money business is organised into several business units, including Operations, Sales & Marketing, Legal, Human Resources, Finance, Compliance, Risk and IT.

### Our supply chain

We deal with hundreds of companies that supply us with a broad range of products and services. In many cases those companies also have extensive supply chains. In terms of modern slavery, we are particularly focused on those supply chains where there is a higher degree of sub-contracting and outsourcing to developing countries and so we pay particular attention to our technology and IT hardware supply chains and/or any providers of branded merchandise.

### Our policies on modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects this commitment, as well our intention to act transparently, ethically and fairly in all our business dealings. The policy also reflects our approach to implementing and

enforcing effective systems and controls to monitor and ensure that our supply chains are free from slavery and human trafficking.

In addition to our Modern Slavery and Human Trafficking Policy, we demonstrate our commitment through our:

- Supplier Management Framework;
- Whistleblowing Policy;
- Anti-Money Laundering Policy and Procedure.

## **Due diligence and contract processes**

At Pepper Money , we hold our suppliers to high standards. We expect suppliers to demonstrate the same level of commitment to the elimination of modern slavery and human rights abuses in their supply chains as we do and this is a major focus of our due diligence and contract negotiation process for new suppliers.

At the outset of a business relationship, all potential suppliers are made aware of our zero-tolerance approach to slavery and human trafficking. We request that suppliers (where applicable) complete our Modern Slavery Act questionnaire so that we can find out more about the business and determine whether a supplier is ‘high risk’ before making a decision on whether to engage that business. We will only enter into a contract or terms of business which address compliance with the Modern Slavery Act 2015 and requires businesses to make an annual confirmation of compliance.

Once onboarded, we expect all our suppliers to:

- conduct their business dealings in a transparent and ethical manner;
- comply with the requirements of Modern Slavery Act 2015;
- notify us as soon as the supplier becomes aware of any actual or suspected slavery or human trafficking in their supply chain; and
- upon request, complete annual confirmation statements.

As part of our initiative to identify and mitigate risk we have a Modern Slavery and Human Trafficking Procedure which sets up a system for:

- assisting employees to identify and assess potential breaches of the Modern Slavery and Human Trafficking Policy and the Modern Slavery Act 2015 in our business including our supply chains through awareness and training;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- providing a system for reporting actual or suspected breaches and for maintaining the confidentiality of the individual making the report.

We have dedicated Risk and Compliance teams, and further support is provided by the following departments:

- Legal
- Human resources
- Operations

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Where we consider it necessary, we also require our business partners to provide training to their staff and suppliers and providers.

## **Our effectiveness in combating slavery and human trafficking**

We have not identified any areas requiring immediate action with regard to supplier relationships, beyond our regular procurement due diligence processes and our internal third-party supplier policies.

We are, however, committed to taking all appropriate steps to mitigate the risk of modern slavery or human trafficking taking place in our supply chain. We are committed to undertaking regular reviews of our procurement and supply chain management procedures to ensure that we are doing everything we can to identify, mitigate and eliminate the risk.

## **Modern Slavery Registry**

In 2021, the UK Government created a Modern Slavery Registry where UK companies can upload their Modern Slavery Statements to demonstrate their compliance with their legal obligations and allows users and consumers to search and access Modern Slavery Statements of UK companies to view how they are identifying and addressing modern slavery risks in operations and supply chains. Pepper Money has been included on this Registry.